## EXHIBIT B

Index # 26960/06 Purchased/Filed: Dece						d: Decembe	ember 5, 2006	
STATE OF NEW YORK		SUPREMI	E COURT	magajusas marana (1,1,1,1,1,1,1,1,1,1,1,1,1,1,1,1,1,1,1,		QUEENS	COUNTY	
	SB Tote	al Transport	Inc.			Р	laintiff	
		against						
	Seko Wor	1dwide LLC	, et al			D	efendant	
STATE OF NEW YORK COUNTY OF ALBANY	SS.:	***************************************						
Diane Koe	hler	, be	ing duly sw	orn, depos	es and say	s: deponent	is over	
the age of eighteen (18) years	; that on	Decembe	er 14, 2006	, at	2:00 pm	_, at the offi	ce of the	
Secretary of State of the State	of New York in t	the City of A	dbany, New	York depo	nent serve	d the annexe	∍d	
	Summor	ns and Verif	ied Compla	int				
							on	
	Seko Cı	ustoms Bro	kerage, Inc	•			, the	
Defendant in this action, by de	livering to and le	aving with		Belinda	Capers-Ga	rdiner		
AUTHORIZED AGENT in the	Office of the Sec	retary of St	ate, of the S	State of Ne	w York, pei	rsonally at the	е	
Office of the Secretary of State	of the State of I	New York,	2tr	ue copies t	hereof and	that at the ti	me	
of making such service, depon	ent paid said Se	cretary of S	tate a fee c	of 40	dollars	; That said s	ervice	
was made pursuant to Section								
	<del>-</del>							
Deponent further says that dep								
of the Secretary of State of the	State of New Yo	ork, duly au	thorized to	accept suc	n service o	n behalf of sa	aid	
defendant.								
Description of the person serve	ed: Approx. Age	e: 40	Appro	x. Wt: <u>18</u>	5 lbs A	Approx. Ht:	5' 9"	
Color of skin: Black Ha	ir color: Black	Sex:	Female	Other: _			***************************************	
*		Į.				/		
Sworn to before me on this								
	ecember, 2006			1				
· · · · · · · · · · · · · · · · · · ·			4	- 1				
DONNA M. T	TIDINGS // C				/) <u>/</u>	oblar	sinus and the second se	
NOTARY PUBLIC, SI No. 01TI4898570, Qualific	tate of New York			//	Diane Ko			
Commission Expires				/Invoic	e•Work Ord	er# SP0605	522	

SERVICO. INC. - PO Box 871 - ALBANY. NEW YORK 12201 - PH 518-463-4179

AFFIDAVIT OF SERVICE

SB TOTAL TRANSPORT INC.,

-against-

Plaintiff,

SEKO WORLDWIDE, LLC, SEKO CUSTOMS BRÖKERAGE, INC., SEKO WORLDWIDE, INC., DISCOVERY CARGO, INC. and TARGET LOGISTIC

SERVICES, a division of TARGET LOGISTICS, INC.,

Defendants.

SUPREME COURT OF THE STATE OF NEW YORK

COUNTY OF QUEENS

Signature (Rule 130-1.1-a)

Print name beneath

Mitchell A. Nathanson

THE NATHANSON LAW FIRM LLP

Office and Post Office Address, Telephone
81 HEMPSTEAD AVENUE
LYNBROOK, NY 11563
TEL. (516) 568-0000

FAX (516) 568-9456

To

Attorney(s) for

Service of a copy of the within is hereby admitted. Dated,

Attorney(s) for

Attorney(s) for

Index # 26960/06	. F	Purchased/Filed: December 5, 2006		
STATE OF NEW YORK	SUPREME COURT	QUEENS COUNT		
	SB Total Transport Inc.	Plaintiff		
	against			
	Seko Worldwide LLC, et al	Defendant		
STATE OF NEW YORK COUNTY OF ALBANY	SS.:			
Diane Koeh	ler, being duly sworn, dep	poses and says: deponent is over		
the age of eighteen (18) years;	that on December 15, 2006,	at2:00 pm, at the office of the		
Secretary of State of the State of	of New York in the City of Albany, New York de	eponent served the annexed		
•	Summons and Verified Complaint			
	·	on		
	Discovery Cargo, Inc.	, the		
Defendant in this action, by deli	vering to and leaving with	Donna Christie ,		
AUTHORIZED AGENT in the O	ffice of the Secretary of State, of the State of I	New York, personally at the		
Office of the Secretary of State	of the State of New York,2 true copie	s thereof and that at the time		
of making such service, depone	nt paid said Secretary of State a fee of4	0 dollars; That said service		
vas made pursuant to Section	306 Business Corporation Law .			
Deponent further says that depo	nent knew the person so served as aforesaid	to be the agent in the Office		
f the Secretary of State of the S	tate of New York, duly authorized to accept s	uch service on behalf of said		
defendant.	•			
escription of the person served	: Approx. Age: 38 Approx. Wt:	145 Approx. Ht: 5'5"		
	color: Blonde Sex: F Other:			
Train	Oct. 1 Outer.			
worn to before me on this				
20th day of Dece	ember, 2006			
PU		A=		
DONNA M. TIDII NOTARY PUBLIC, State No. 01TI4898570, Qualified ii Commission Expires Jur	of New York Albany County	Diane Koehler iice•Work Order # SP0605520		
SERVICO INC - PO	Box 871 - ALBANY. NEW YORK 12201			

Index # 26960/06				Purchase	d/Filed: December 5, 2006
STATE OF NEW YORK		SUPREME	COURT		QUEENS COUNT
	SB Total	Transport	Inc.		Plaintiff
	ag	gainst			
	Seko World	wide LLC,	et al		Defendant
STATE OF NEW YORK COUNTY OF ALBANY	SS.:				
Diane Koehl	er	, be	ing duly swor	n, deposes an	d says: deponent is over
the age of eighteen (18) years; t	hat on	Decembe	r 19, 2006	, at <u>2:0</u>	pm , at the office of the
Secretary of State of the State o	f New York in the	City of A	lbany, New Y	ork deponent	served the annexed
	Summons	and Verifi	ed Complaint		
					OI
	Seko	Worldwid	e, LLC		, the
Defendant in this action, by deliv	ering to and leav	ing with _		Amy Le	esch ,
AUTHORIZED AGENT in the Of	fice of the Secret	tary of Sta	te, of the Sta	te of New Yor	k, personally at the
Office of the Secretary of State of	of the State of Ne	w York,	2 true	copies thereo	f and that at the time
of making such service, deponer	nt paid said Secre	etary of St	ate a fee of	40 de	ollars; That said service
was made pursuant to Section	303 Limited Liab	ility Comp	any Law		
Deponent further says that depor	nent knew the pe	rson so se	erved as afore	esaid to be the	e agent in the Office
of the Secretary of State of the S	tate of New York	, duly auth	norized to acc	ept such serv	ice on behalf of said
defendant.		•		•	•
Description of the person served:	: Approx. Age:	23	Approx. V	Vt: 160	Approx. Ht: 5'9"
Color of skin: White Hair		-	<del></del>		
Sworn to before me on this					1
22nd day of Dece	ember, 2006				
0. 2		(			
DONNA M. TIDIN				Dia	ne Koehler
NOTARY PUBLIC, State No. 01Tl4898570, Qualified ir Commission Expires Jur	Albany County			InvoicesMork	Order# SP0605518

Index # 26960/06				Purchase	ed/Filed: Decem	ber 5, 2006
STATE OF NEW YORK		SUPREMI	E COURT		QUEE	NS COUNT
	SB Tota	al Transport	Inc.			Plaintiff
		against				
	Seko Wol	rldwide LLC,	, et al			Defendant
STATE OF NEW YORK COUNTY OF ALBANY	SS.:					-
Diane Koeh	ler	, be	ing duly sworn	, deposes ar	nd says: depone	nt is over
the age of eighteen (18) years; t	that on	Decembe	r 19, 2006	, at <u>2:0</u>	0 pm _, at the o	office of the
Secretary of State of the State of	of New York in	the City of A	lbany, New Yo	rk deponent	served the anne	exed
	Summoi	ns and Verifi	ied Complaint			
						or
Seko Worldwide, In	ıc. nka Seko C	ustoms Brok	cerage, Inc. sh	a Seko Worl	dwide, Inc.	, the
Defendant in this action, by deliv	ering to and le	aving with		Amy Le	esch	<b>F</b>
AUTHORIZED AGENT in the Of	ffice of the Sec	retary of Sta	ate, of the State	e of New Yor	k, personally at	the
Office of the Secretary of State of	of the State of I	New York,	2 true c	copies thereo	f and that at the	time
of making such service, depone	nt paid said Se	cretary of St	tate a fee of _	40 d	ollars; That said	service
was made pursuant to Section	306 Business	Corporation	Law .			
Dependent further against that dans	nont knougtha					<b>ec:</b>
Deponent further says that depo		•				
of the Secretary of State of the S	tate of New Yo	ork, duly autr	norized to acce	ept such serv	ice on behalf of	said
defendant.						
Description of the person served	: Approx. Age	e: <u>23</u>	_ Approx. W	/t:160	_ Approx. Ht:	5'9"
Color of skin: White Hair	color: Blonde	<u>e</u> Sex:_	<u> </u>	ther:		
Sworn to before me on this					1	
22nd day of Dece	ember, 2006	,			_	
P 1			- X		X	
DONNA M. TIDII NOTARY PUBLIC, State		And the state of t		DA	ne Kdehler	
No. 01TI4898570, Qualified i Commission Expires Ju	n Albany County			Invoice•Work	c <b>/</b> rder# SP060	5519
	•				J	<del></del>

81 HEMPSTEAD AVENUE

LYNBROOK, NY 11563

Office and Post Office Address

. Case 1:07-cv-03258-VM

To

Document 3-5

one of the judges of the within named Court, at

Z

Yours, etc.

THE NATHANSON LAW FIRM LLP

81 HEMPSTEAD AVENUE Office and Post Office Address LYNBROOK, NY 11563

Attorney(s) for

Filed 04/24/2007

Attorney(s) for To

NOTICE OF SETTLEMENT

PLEASE take notice that an order

of which the within is a true copy will be presented for settlement to the Hon.

Dated,

Attorney for

Index No. SUPREME COURT OF THE STATE OF NEW YORK COUNTY OF QUEENS 26960

SB TOTAL TRANSPORT INC.,

duly entered in the office of the clerk of the within

PLEASE take notice that the within is a (certified)

true copy of a

named court on

Plaintiff,

-against-

BROKERAGE, INC., SEKO WORLDWIDE, INC., SERVICES, a division of TARGET LOGISTICS, INC., DISCOVERY CARGO, INC. and TARGET LOGISTIC SEKO WORLDWIDE, LLC, SEKO CUSTOMS

Defendants.

AFFIDAVITS OF SERVICE

Signature (Rule 130-1.1-a)

Mitchell A. Nathanson

Print name beneath

Attorney for THE NATHANSON LAW FIRM LLP

Office and Post Office Address, Telephone 81 HEMPSTEAD AVENUE

LYNBROOK, NY 11563 TEL. (516) 568-0000

FAX (516) 568-9456

To

Attorney(s) for

Dated, Service of a copy of the within is hereby admitted.

Attorney(s) for

2900 - Blumberg Excelsior Inc., NYC 10013

Index # 26960/06			Purchased/Filed: December 5, 2006					
STATE OF NEW YORK		SUPREM	E COURT		QUEENS COUNTY			
	SB	Total Transport	t Inc		Plaintiff			
	0.5	against						
	Seko I	Worldwide LLC	;, et al		Defendant			
STATE OF NEW YORK COUNTY OF ALBANY	<b>SS</b> .:							
Diane Koeh	nler	, be	eing duly swo	orn, deposes and	says: deponent is over			
the age of eighteen (18) years;	that on _	Decembe	er 14, 2006	, at <u>2:00</u>	pm_, at the office of the			
Secretary of State of the State	of New York	in the City of	Albany, New	York deponent se	erved the annexed			
	Sum	mons and Veri	fied Complai	int	on.			
					on			
Target Logi	stic Services	s, Inc. sued he	rein as Targ	et Logistic Service	es, the			
Defendant in this action, by del	ivering to an	d leaving with		Belinda Capers	-Gardiner ,			
AUTHORIZED AGENT in the C	Office of the	Secretary of St	ate, of the S	tate of New York,	personally at the			
Office of the Secretary of State	of the State	of New York,	2tru	ue copies thereof	and that at the time			
of making such service, depone	ent paid said	i Secretary of S	State a fee o	f <u>40</u> dol	lars; That said service			
was made pursuant to Section	306 Busin	ess Corporatio	n Law					
Deponent further says that dep	onent knew	the person so	served as af	oresaid to be the	agent in the Office			
of the Secretary of State of the	State of Nev	w York, duly au	ıthorized to a	accept such service	e on behalf of said			
defendant.								
Description of the person serve	ed: Approx.	Age: 40_	Approx	x. Wt: 185 lbs	Approx. Ht: 5' 9"			
		Black Sex:						
Sworn to before me on this								
18TH day ofDe	cember, 200	06		V 6				
				<del>/</del>	1			
DV DONNA M T	IDINGS 1-	-	- 1	then	Dark -			
DONNA M. TI NOTARY PUBLIC, Sta No. 01TI4898570, Qualifie	ate of New York	ntv		Diath	e Koenler			
Commission Expires				Invoice Work	Order# SP0605521			

Attorney for

70

duly entered in the office of the clerk of the within named court on true copy of a Dated,

PLEASE take notice that the within is a (certified)

Index No.

SUPREME COURT OF THE STATE OF NEW YORK COUNTY OF QUEENS

SB TOTAL TRANSPORTING.,

-against-

Plaintiff.

Attorney for Yours, etc.
THE NATHANSON LAW FIRM LLP

81 HEMPSTEAD AVENUE Office and Post Office Address LYNBROOK, NY 11563

> SERVICES, a division of TARGET LOGISTICS, INC., DISCOVERY CARGO, INC. and TARGET LOGISTIC SEKO WORLDWIDE, LLC, SEKO CUSTOMS BROKERAGE, INC., SEKO WORLDWIDE, INC.,

Defendants.

Attorney(s) for

NOTICE OF SETTLEMENT

PLEASE take notice that an order

for settlement to the Hon. of which the within is a true copy will be presented

one of the judges of the within named Court, at

X

Yours, etc.

THE NATHANSON LAW FIRM LLP

81 HEMPSTEAD AVENUE Office and Post Office Address LYNBROOK, NY 11563

To

Attorney(s) for

AFFIDAVIT OF SERVICE

Signature (Rule 130-1.1-a)

Mitchell A. Nathanson

Print name beneath

THE NATHANISON LAW FIRM LLP

Office and Post Office Address, Telephone 81 HEMPSTEAD AVENUE LYNBROOK, NY 11563 TEL. (516) 568-0000

FAX (516) 568-9456

To

Attorney(s) for

Dated, Service of a copy of the within is hereby admitted.

Attorney(s) for

2900 - Blumberg Excelsior Inc., NYC 10013

## EXHIBIT C



SUPREME COURT	OF	THE	STATE	OF	NEW	YORK
COUNTY OF QUEE	NS					

SB TOTAL TRANSPORT INC.,

Plaintiff,

Index No. 26960/06

-against-

SEKO WORLDWIDE, LLC, SEKO CUSTOMS BROKERAGE, INC., SEKO WORLDWIDE INC., DISCOVERY CARGO, INC. AND TARGET LOGISTIC SERVICES, a division of TARGET LOGISTICS, INC., SEKO WORLDWIDE, LLC'S VERIFIED ANSWER

	Defendants.

Defendants, SEKO Worldwide, LLC, SEKO Customs Brokerage, Inc. and SEKO Worldwide, Inc. (collectively, "SEKO"), by its attorneys Leader & Berkon LLP and Goldberg Kohn Bell Black Rosenbloom & Moritz, Ltd., Answer the Complaint of Plaintiff, SB Total Transport, Inc., as follows:

- 1. SEKO denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 1 of the Complaint.
- 2. SEKO admits that SEKO Worldwide, LLC is a Delaware limited liability company with its principal place of business located at 1100 Arlington Heights Road, Suite 600, Itasca, Illinois 60143. Except as expressly admitted, SEKO denies the allegations contained in paragraph 2 of the Complaint.
- 3. SEKO admits that SEKO CUSTOM BROKERAGE, INC. and SEKO WORLDWIDE, INC. are Delaware corporations with their principal place of business located at 1100 Arlington Heights Road, Suite 600, Itasca, Illinois 60143. Except as expressly admitted, SEKO denies the allegations contained in paragraph 3 of the Complaint.

- SEKO denies knowledge or information sufficient to form a belief as to 4. the truth of the allegations contained in paragraph 4 of the Complaint.
- SEKO denies knowledge or information sufficient to form a belief as to 5. the truth of the allegations contained in paragraph 5 of the Complaint.

### AS AND FOR SEKO'S ANSWER TO THE FIRST CAUSE OF ACTION

- In response to the allegations contained in paragraph 6 of the Complaint, 6. SEKO hereby repeats and realleges each and every answer to paragraphs 1 through 5 of the Complaint as if they were fully set forth herein.
- SEKO denies that it requested services from Plaintiff at any time prior to 7. June 1, 2006. Further answering, SEKO denies that prior to June 1, 2006, Plaintiff rendered any services of any kind on SEKO's behalf. SEKO denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 7 of the Complaint.
- SEKO denies that it requested services from Plaintiff at any time prior to 8. June 1, 2006. Further answering, SEKO denies that prior to June 1, 2006, Plaintiff rendered any services of any kind on SEKO's behalf. SEKO denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 8 of the Complaint.
- SEKO denies that it requested services from Plaintiff at any time prior to 9. June 1, 2006. Further answering, SEKO denies that prior to June 1, 2006, Plaintiff rendered any services of any kind on SEKO's behalf. Consequently, SEKO denies that it is indebted to

2007

Plaintiff in any amount. SEKO denies knowledge or information sufficient to form a belief as to the remaining allegations contained in paragraph 9 of the Complaint.

### AS AND FOR SEKO'S ANSWER TO THE SECOND CAUSE OF ACTION

- 10. In response to the allegations contained in paragraph 10 of the Complaint, SEKO hereby repeats and realleges each and every answer to paragraphs 1 through 9 of the Complaint as if they were fully set forth herein.
- account at any time prior to June 1, 2006. Further answering, SEKO denies that, prior to June 1, 2006, Plaintiff rendered any services of any kind on SEKO's behalf or that SEKO directed Plaintiff to render any services on its behalf. Consequently, SEKO denies that it is indebted to Plaintiff in any amount. SEKO admits that Exhibit A appears to be invoices. SEKO denies knowledge or information sufficient to form a belief as to the remaining allegations contained in paragraph 11 of the Complaint.
- June 1, 2006. Further answering, SEKO denies that prior to June 1, 2006, Plaintiff rendered any services of any kind on SEKO's behalf. Consequently, SEKO denies that it is indebted to Plaintiff in any amount. SEKO denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 12 of the Complaint.
- June 1, 2006. Further answering, SEKO denies that prior to June 1, 2006, Plaintiff rendered any services of any kind on SEKO's behalf. Consequently, SEKO denies that it is indebted to Plaintiff in any amount. SEKO denies knowledge or information sufficient to form a belief as to the remaining allegations contained in paragraph 13 of the Complaint.

Filed 04/24/2007

SEKO denies that it requested services from Plaintiff at any time prior to 14. June 1, 2006. Further answering, SEKO denies that prior to June 1, 2006, Plaintiff rendered any services of any kind on SEKO's behalf. Consequently, SEKO denies that it is indebted to Plaintiff in any amount. SEKO denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 14 of the Complaint.

### FIRST AFFIRMATIVE DEFENSE

The Complaint fails to state a cause of action against SEKO. 15.

#### SECOND AFFIRMATIVE DEFENSE

Plaintiff's damages, if any, were caused in whole or in part by individuals 16. or entities other than SEKO, and over whom SEKO had no control or responsibility.

### THIRD AFFIRMATIVE DEFENSE

The Complaint is barred as against SEKO for lack of privity. 17.

### FOURTH AFFIRMATIVE DEFENSE

The Complaint is barred by the Statute of Limitations. 18.

WHEREFORE, SEKO demands judgment dismissing the Complaint against SEKO, awarding costs and disbursements in connection with this action, including reasonable attorneys' fees, and such other and further relief as this Court may deem just and proper.

Dated:

New York, New York

February 5, 2007

LEADER & BERKON LLP

Bv

JUDITH A. JOSEPH JENKINS 630 Third Avenue, 17<sup>th</sup> Floor New York, NY 10017 (212) 486-2400

-and-

William C. Meyers Vanessa B.M. Vergara GOLDBERG KOHN BELL BLACK ROSENBLOOM & MORITZ, LTD. 55 East Monroe Street, Suite 3700 Chicago, IL 60603 (312) 201-4000

Attorneys for Defendants Seko Worldwide LLC, Seko Customs Brokerage, Inc. and Seko Worldwide Inc

To: Mitchell A. Nathanson, Esq.
THE NATHANSON LAW FIRM LLP
81 Hempstead Avenue
Lynbrook, New York 11563
Attorneys for Plaintiff
SB Total Transport Inc.

Case 1:07-cv-03258-VM

### VERIFICATION

I, William J. Wascher, President and CEO of SEKO Worldwide, LLC., under penalties as provided by law pursuant to Article 30-3020 of the New York Code of Civil Procedure, certify that the statements set forth in SEKO Worldwide LLC's Verified Answer to Verified Complaint are true and correct, to the best of my knowledge, information and belief. William / Wascher

SUPREME COURT OF THE STATE OF NEW YORK COUNTY OF QUEENS Index No. 26960-06

SB TOTAL TRANSPORT, INC.,
Plaintiff,

-against-

SEKO WORLDWIDE, LLC, SEKO CUSTOMS BROKERAGE, INC., SEKO WORLDWIDE INC., DISCOVERY CARGO, INC. AND TARGET LOGISTIC SERVICES, a division of TARGET LOGISTICS, INC.,

Defendants.

SEKO WORLDWIDE, LLC'S VERIFIED ANSWER

LEADER & BERKON LLP

NEW YORK, NY 10017

(212) 486-2400

ATTORNEYS FOR

NON-PARTY MORGAN STANLEY CO. INCORPORATED

Page 18 of 27

## EXHIBIT D

### David Bolton, P.C.

Attorney at Law

666 Old Country Road Suite 509 Garden City, New York 11530 Tel: (516) 222-0600 Fax (516) 222-1110

David Bolton, Esq.

Christopher Hanscom, Esq., Of Counsel

February 1, 2007

### Via Fax:

Mitchell A. Nathanson, Esq. The Nathanson Law Firm 81 Hempstead Avenue Lynbrook, New York 11563

Re:

SB Total Transport Inc. v. Seko Worldwide, et al

Index No.: 26960/06

Dear Mitchell:

This shall confirm that the time for Discovery Cargo, Inc and Target Logistic Services to respond to the Complaint in the action referred to above has been extended up to and including February 5, 2007.

Please sign below to confirm same and fax this letter back to my attention.

Your consideration in this matter is appreciated. Do not hesitate to contact me if you have any questions.

Very truly yours,

Obristopher Hanscom

Accepted and Agreed:

Mitchell A. Nathanson

# EXHIBIT E

516-222-1110 Atty & Chis Wonscom

LAW OFFICES

Countryman & McDaniel

MICHAEL S MCDANILLE BYRON E COUNTRYMAN ANDREW D. KEHAGIARASTA CHRISTOPH M. WAHNER

ALSO ADMITTED IN MICHIGAN ROCTOR IN ADMIRALTS

LAX AIRPORT CENTER ELEVENTH FLOOR 5933 WEST CENTURY BOULEVARD LOS ANGELES, CALIFORNIA 90045 TEL (310) 342-6500

FAX (3IQ) 346-8505 E-MAIL: info@cargolaw.com www.cargolaw.com

9 January 2007

Via facsimile to: 516.568.9456 Mitchell A. Nathanson, Esq. The Nathanson Law Firm LLP 81 Hempstead Avenue Lynbrook, NY 11563

> Re: Target Logistics, Inc. adv. SB Total Transport, Inc.

New York Supreme Court Case No. 26960/06 Our Reference 4809-901 Claim Amount Not Advised

Subject: <u>Acknowledgment</u>

Dear Mr. Nathanson:

I am writing on behalf of Target Logistics, Inc. to acknowledge your letter dated 5 January 2007.

Our client is a publicly traded entity which prefers to resolve disputes by voluntary means. Unfortunately, the subject matter of your action cannot be identified without reviewing the complaint. Accordingly, I would appreciate receiving a copy of the complete lawsuit by return fax -and a suitable time extension for reviewing this matter with an eye toward resolution.

Thank you in advance for this courtesy.

With kind regards,

Countryman & McDaniel

Michael S. McDaniel

MSM/aw

LAW OFFICES

Countryman & Mc Daniel

MICHAEL S. MCDANIELS BYRON E COUNTRYMAN ANDREW D. KEHAGIARASTO CHRISTOPH M. WAHNER

TALSO ADMITTED IN MICHIGAN SHOCKTOR IN ADMIRALTS

LAX AIRPORT CENTER ELEVENTH FLOOR 5933 WEST CENTURY BOULEVARD LOS ANGELES, CALIFORNIA 90045 TEL (310) 342-6500

FAX (3(0) 342-6505 E-MAIL: Info@cargolaw.com www.cargolaw.com

6 February 2007

Via Facsimile to 516-568-9456 Mitchell A. Nathanson, Esq. The Nathanson Law Firm LLP 81 Hempstead Avenue Lynbrook, NY 11563

Target Logistics, Inc. adv. SB Total Transport, Inc.

New York Supreme Court Case No. 26960/06 Our Reference 4809-901 Claim Amount Not Advised

#### Dear Mr. Nathanson:

I am receipt of a copy of my correspondence regarding our request for dismissal of Target Logistic Services from the above-referenced lawsuit, upon which you had handwritten "no."

We are of course aware Mr. David Bolton of Garden City, New Jersey has assumed the defense of Target Logistic Services. Irrespective of that fact, this firm represents Target Logistic Services Inc. and demands its immediate dismissal based upon the Discovery asset purchase agreement, a copy of the front page of which was previously sent to you.

You are now on notice that Target Logistic Services has no legal responsibility for the debt of Discovery. Your failure to dismiss Target in 5 days shall result in our instruction to Mr. Bolton to proceed with appropriate motions for Target's dismissal to include attorneys' fees and sanctions for the inappropriate and malicious prosecution of Target in this matter.

With kind regards,

Byron E. Countryman

BEC/mp

Countryman & McDaniet

Countryman & McDaniel

Mitchell A. Nathanson, Esq. The Nathanson Law Firm LLP 6 February 2007 Page 2

cc: David Bolton, Esq. David Bolton, P.C.

ce: Chris Coppersmith, President, CEO Target Logistic Services Inc.

## EXHIBIT F

### THE Nathanson Law Firm LLP

81 Hempstead Avenue Lynbrook, NY 11563 (516) 568-0000 Fax (516) 568-9456

Mark Nathanson Mitchell A. Nathanson

mark@nathansonlaw.com mitchell@nathansonlaw.com

Of Counsel:
Diane Memmoli

January 5, 2007

#### \*Personal & Confidential\*

Discovery Cargo, Inc. 147-10 181<sup>st</sup> Street Jamaica, NY 11413

Re: S

**SB Total Transport Inc.** 

To the Above-Named Defendant:

Please be advised that an action has been commenced against you. Service has been made on the Secretary of State pursuant to BCL §306(b). A copy of the Summons is enclosed in accordance with CPLR 3215(g)4(ii).

Failure to respond within 20 days may result in the entry of a default judgment against you.

Please guide yourself accordingly.

Very truly yours,

MITCHELL A. NATHANSON

MAN/ej Enc.

### THE Nathanson Law Firm LLP

81 Hempstead Avenue Lynbrook, NY 11563 (516) 568-0000 Fax (516) 568-9456

Mark Nathanson

Mitchell A. Nathanson

mark@nathansonlaw.com mitchell@nathansonlaw.com

Of Counsel:
Diane Memmoli

January 5, 2007

### \*Personal & Confidential\*

Target Logistic Services, Inc. 1400 Glenn Curtiss Street Carson, CA 90746

Re: SB Total Transport Inc.

To the Above-Named Defendant:

Please be advised that an action has been commenced against you. Service has been made on the Secretary of State pursuant to BCL §306(b). A copy of the Summons is enclosed in accordance with CPLR 3215(g)4(ii).

Failure to respond within 20 days may result in the entry of a default judgment against you.

Please guide yourself accordingly.

Very truly yours,

MITCHELL A. NATHANSON

MAN/ej Enc.

### THE Nathanson Law Firm LLP

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Of Counsel:
Diane Memmoli

January 5, 2007

#### \*Personal & Confidential\*

Target Logistic Services, a
Division of Target Logistics, Inc.
1400 Glenn Curtiss Street
Carson, CA 90746

Re:

SB Total Transport Inc.

To the Above-Named Defendant:

Please be advised that an action has been commenced against you. Service has been made on the Secretary of State pursuant to BCL §306(b). A copy of the Summons is enclosed in accordance with CPLR 3215(g)4(ii).

Failure to respond within 20 days may result in the entry of a default judgment against you.

Please guide yourself accordingly.

Very truly yours,

MITCHELL A. NATHANSON

MAN/ej Enc.